

Regarding ET Docket 02-98, as a licensed amateur radio operator since 1969 and a radio systems engineer with Motorola since 1974, I feel that I am qualified to offer the following comments.

1. I have been using the Oscar 40 satellite which has a downlink on the 2401 MHz band. I have successfully communicated during satellite passes that involved very low antenna elevations above the horizon. It is critical to the success of the amateur radio satellite program that there be no interference to these weak signals on 2401 MHz. I strongly endorse the need for a primary amateur radio service allocation.

2. With the present reduction in solar activity and subsequent changes every 5.5 years, it is critical for the success of the amateur radio service emergency communications capability to be able to have an additional band in the 5.25 to 5.4 MHz region of the HF spectrum. This band has been proven to provide the continuity of communications over various distances that are necessary for full time emergency communications.

3. The new 136 KHz allocation will be a very useful tool for the amateur radio community to be able to study and learn about lower wavelength communications, noise reduction techniques which may apply to other bands, and new digital narrow band modes which can be used in that environment. This allocation will be in line with other countries who have allocated this spectrum for experimentation.